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1. <i>DHSA</i>	28 OCT 1982	
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25 OCT 1982

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82-2583

DDS&T-4011-82

MEMORANDUM FOR: Deputy Director for Administration

FROM: R. E. Hineman
Deputy Director for Science and Technology

SUBJECT: Proposed Exemptions to [REDACTED]

REFERENCE: [REDACTED] Policy and Procedures for Management
of Information Handling Systems

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1. The purpose of this memorandum is to reiterate certain proposed changes to the referenced Headquarters Notice. Although that notice expired on October 1, I am assuming that its reissuance is, at least, under consideration.

2. As you know, the DS&T is heavily involved in the use of automated systems. Many of these, however, are one-of-a-kind systems, research oriented, or subsystems embedded in larger systems. The broad scope of [REDACTED] encompasses these and, if enforced, would place an undue burden on our project managers.

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3. I urge your consideration of the following:

a. Exclude from the review process systems of short expected operational life.

b. Exclude those systems whose basic aim is research, as opposed to the provision of information services.

Where these research projects deal with the application of new technologies to information handling problems, they are in response to coordinated and approved requirements revalidated yearly. If correctly focused they are speculative, and likely to "fail" in the sense of not leading to a follow-on system acquisition/development activity (but, of course, "succeed" in the sense of evaluating fairly the technology).

Where these projects are used only for providing a research test bed, and not for the provision of an information service to the Agency, they are already subject to a larger requirements and review process and, of course, subjected to a "proof by use" in the course of the R&D activity to which they are subordinated (see also, the proposed embedded system exclusion below).

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c. Exclude those systems which are embedded in a larger system and which do not, of themselves, provide an information service to the Agency.

Principles which guide the review and evaluation of the larger "parent" system should apply. Such embedded systems, which do not have a separate existence, should not be burdened with two sets of objectives which are engendered by two independent review procedures.

Of course, if the larger "parent system" is itself qualified for such review, then it must abide by the applicable policies.

4. Therefore, I suggest that any reissuance of include the following exemption:

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"ADP equipment or software is exempt from the requirements stated herein if built or modified to special government specifications which have little or no general purpose applicability and are integral to, embedded in, and have an expected operational life of short duration. Included also in this exemption are ADP equipment or software whose basic aim is solely to provide a research test bed."

5. I suggest these recommendations be favorably considered and would be happy to discuss these issues further if that is desired.

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R. E. Hineman

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